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June 3, 2022

By ECF

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Donnell Bruns*, 21 Cr. 499 (PAE)

Your Honor:

I represent Donnell Bruns in the above-captioned case and I write respectfully to request permission for him to spend two days at his sister's house in Pennsylvania to attend his niece's graduation. If permitted, Mr. Bruns would leave New York on June 10 and return on June 12. He would be driven by a relative and stay with his sister at an address known to Pretrial Services. He would attend the graduation on June 11.

Mr. Bruns was released on August 13, 2021, on a \$50,000 bond signed by two financially responsible persons and conditions including home incarceration, electronic monitoring, and drug treatment. The Court reduced home incarceration to home detention on October 25, 2021. Dkt. 71. The Court then reduced home detention to a curfew on February 11, 2022. Dkt. 115. Mr. Bruns continues to wear an electronic ankle bracelet. He has remained fully compliant as restrictions have loosened; he completed a drug program; and he is employed full time.

I conferred with Pretrial Services Officer Joshua Rothman, who informs me that "Pretrial Services objects to travel for defendants subject to location monitoring." But Officer Rothman states that I may tell that Court "that Mr. Bruns has been in full compliance with his bail conditions." AUSA Christy Slavik informs me that the government takes no position on this request.

At this point, Mr. Bruns has proved himself worthy of the trust the Court placed in him by granting bail – he is neither a flight risk nor a danger. His release conditions have been continuously reduced to the point where he now has merely a curfew with an ankle bracelet. He is working full time at a shelter on Randall's Island. He pled guilty on April 5 and is scheduled to be sentenced on August 9. Pretrial Services' position is, as I understand it, a general position about people with electronic ankle monitors that does not consider Mr. Bruns' specific case, including his more than one half year of bail compliance, mature age of 41 years old, and that he is neither charged with violence nor believed to be gang affiliated. Indeed, by inviting me to inform that Court that Mr. Bruns has been fully compliant, Pretrial has, in effect, flagged a key

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reason why he can be trusted to stay with his sister for two days.

For the foregoing reasons, I respectfully request that the Court endorse this letter to permit Mr. Bruns to travel to Pennsylvania and stay with his sister from June 10 to June 12. Thank you for your consideration.

Respectfully submitted,


/s/ Benjamin Silverman
Benjamin Silverman

cc: Counsel of record (by ECF)
Pretrial Officer Joshua Rothman (by email)

GRANTED. The Clerk of Court is requested to terminate the motion at Dkt. No. 146.

6/3/2022

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge